
1909 K Street, NW
12th Floor
Washington, DC 20006-1157
TEL 202.661.2200
FAX 202.661.2299
www.ballardspahr.com

Seth D. Berlin
Tel: 202.508.1122
Fax: 202.661.2299
berlins@ballardspahr.com

Maxwell S. Mishkin
Tel: 202.508.1140
Fax: 202.661.2299
mishkinm@ballardspahr.com

November 23, 2022

Via ECF and Electronic Mail

The Honorable Analisa Torres
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: *Goodman v. Bouzy, et al.*, Case No. 1:21-cv-10878-AT-JLC

Dear Judge Torres:

Pursuant to Rule I.B. of Your Honor's Individual Practices, we write on behalf of defendants Christopher Bouzy and Bot Sentinel Inc. Our firm is in the process of being retained to represent them in the above-captioned matter. Once retained, we intend to follow the procedures set out in Rule III.B. of Your Honor's Individual Practices in connection with moving to dismiss Plaintiff's claims against Mr. Bouzy and Bot Sentinel for lack of personal jurisdiction and failure to state a claim. We see from the docket that Plaintiff is seeking a default against them and respectfully suggest that, in light of the above, a default would not be warranted.

Thank you for your attention to this matter and all best wishes for a happy Thanksgiving.

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Seth D. Berlin
Seth D. Berlin (SB7978)
Maxwell S. Mishkin (*pro hac vice* forthcoming)

cc: All parties via ECF and email